

**WORLDCom**

**ORIGINAL**

1133 19th Street, NW  
Washington, DC 20036  
202 872 1600

EX PARTE OR LATE FILED

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June 6, 2001

Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
445 12 St., S.W.  
Washington, D.C. 20554

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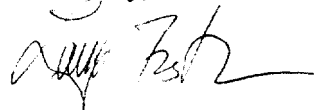
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Ex Parte, Telecommunications Services for Individuals with  
Hearing and Speech Disabilities, and the Americans with Disabilities  
Act of 1990, CC Docket No. 98-67**

Dear Ms Salas:

On July 21, 2000, WorldCom, Inc. ("WorldCom") petitioned the Commission to reconsider its decision that telecommunications relay services are not telecommunications.<sup>1</sup> Please withdraw this request from our petition for reconsideration.

Sincerely,



Larry Fenster

cc: Karen Peltz-Strauss  
Jerry Stanshine  
Pam Slipakoff  
Jennifer Simpson  
Susan McNaughty

Pam Gregory  
Sean White  
Dana Jackson  
Les Selzer

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<sup>1</sup> WorldCom Petition for Reconsideration, Telecommunications Relay services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 98-67, July 21, 2000, at 4-6.

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June 6, 2001

Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
445 12 St., S.W.  
Washington, D.C. 20554

**Re: Ex Parte, Implementation of Section 255 and 251(a)(2) of the  
Communications Act of 1934, as Enacted by the Telecommunications;  
Access to Telecommunications Services, Telecommunications  
Equipment and Customer Premises Equipment and Customer  
Premises Equipment by Persons with Disabilities, WT Docket No. 96-  
198**

Dear Ms Salas:

Please submit the following letter into the record in the above-captioned docket.

Sincerely,



Larry Fenster

cc: Sean White  
Karen Peltz-Straus  
Pam Gregory

No. of Copies rec'd 0+1  
List A B C D E

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Washington, DC 20036  
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June 6, 2001

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JUN 6 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Sean White  
Consumer Information Bureau  
Federal Communications Commission  
445 12 St., S.W.  
Washington, D.C. 20554

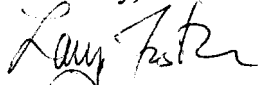
Dear Mr. White:

I am writing this brief letter to clarify WorldCom Inc.'s ("WorldCom") position regarding the regulatory status of IP Telephony. In a February 7, 2001 meeting with WorldCom's IP-Relay team, and Commission staffers Karen Peltz-Strauss, Staci Pies, Scott Marshal, Jerry Stanshine, Pam Slipakoff, and yourself, you stated you understood WorldCom to advocate the view in the Section 255 Notice of Inquiry that IP Telephony is a telecommunications service.<sup>1</sup>

This is not WorldCom's position. Our comments stated that the Commission has traditionally defined a service according to its features, independent of the transmission media of the service. The language in our comments was reflective of the analysis of positions taken by the Commission in its Universal Service Report to Congress, where it tentatively concluded that a pure case of voice-to-voice transmission over the internet would appear to be telecommunications.<sup>2</sup>

WorldCom does not believe it is possible, or advisable, to separate out a pure voice-to-voice transmission component from other capabilities that are undoubtedly information services. The viewpoint expressed in our Section 255 NOI comments was reflective of the Commission's positions, rather than our own. We recognize the possibility that our comments were not understood in this manner, and intend this letter to clarify that WorldCom believes that voice communication as part of an information service should not be considered to be a telecommunications service.

Sincerely,

  
Larry Fenster

<sup>1</sup> MCI WorldCom Comments, Notice of Inquiry, Implementation of Section 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996; Access to Telecommunications Services, Telecommunications Equipment and Customer Premises Equipment and Customer Premises Equipment by Persons with Disabilities, WT Docket No. 96-198, January 13, 2000.

<sup>2</sup> In the Matter of Federal-State Joint Board on Universal Service, Report To Congress ("Report to Congress") CC Docket No. 96-45, Released April 10, 1998, at ¶ 87.